

**FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Amendment of Section 73.622(i),)	MB Docket No. 13-182
Post-Transition Table of DTV Allotments,)	RM-11701
Television Broadcast Stations)	
(Cedar Rapids, Iowa))	
)	

**COMMENTS IN RESPONSE TO
NOTICE OF PROPOSED RULEMAKING**

King Street Wireless, L.P. (“King Street”), by counsel and pursuant to the Commission’s invitation in the referenced proceeding¹, hereby provides its comments in support for a change in table of television channel allocations as set forth in Section 73.622(i) of the Commission’s rules.

As explained in the NPRM, KGAN Licensee, LLC (“KGAN”) is licensed over Channel 51 in the vicinity of Cedar Rapids, Iowa. By its petition for rulemaking (“Petition”), KGAN requests the substitution of Channel 29 for Channel 51 at Cedar Rapids.

King Street fully endorses the KGAN Petition. It agrees both that grant of the channel change would serve the public interest and that the Commission’s generic freeze on the acceptance of petitions to change the table of TV channel allocations² does not extend to situations such as this. Indeed, this Petition falls squarely within an express exemption to the general rule.³ Moreover, as the Commission properly observed in the NPRM: “This channel

¹ Notice of Proposed Rulemaking to Amend Section 73.622(i) relating to Cedar Rapids, Iowa, MB Docket No. 13-182, RM-11701, DAB-1577, ___ Fed. Reg. ___, rel. July 23, 2013 (the “NPRM”).

² Public Notice, “Freeze on the Filing of Petitions for Digital Channel Substitutions, Effective Immediately,” 26 FCC Rcd 7721 (MB 2011).

³ Public Notice, “General Freeze on the Filing and Processing of Applications for Channel 51 Effective Immediately and Sixty (60) Day Amendment Window for Pending Channel 51 Low Power Television, TV Translator and Class A Applications,” 26 FCC Rcd 11409 (MB 2011).

change meets the technical requirements set forth in Sections 73.616 and 73.623 of the Commission's Rules". NPRM, at para 4.

The subject channel involves the very type of cooperation between television broadcast and wireless licensees that the Commission encourages. When approved, television broadcast operations can continue unimpeded; wireless operations can be expanded without interference; and one potential complication involving the upcoming incentive auction will be removed. All of this serves the public interest.

WHEREFORE, King Street urges the Commission to grant expeditiously the KGAN Petition.

Respectfully submitted,

KING STREET WIRELESS, L.P.

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